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Attorneys for Plaintiff and the Proposed Class

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

TINAMARIE BARRALES, individually
and on behalf of all others similarly
situated,

Plaintiff,

v.

NEW CHAPTER, INC.,

Defendant.

Case No. 2:25-cv-01171-HDV-KES

CLASS ACTION

**DECLARATION OF LILACH H.
KLEIN IN SUPPORT OF
STIPULATION AND REQUEST
FOR REMOTE APPEARANCE ON
DEFENDANT'S MOTION TO
DISMISS COMPLAINT,
SCHEDULED FOR MAY 15, 2025**

Date: May 15, 2025

Time: 10:00 a.m.

Ctrm: 5B

Judge: Hon. Hernán D. Vera

Action Filed: Feb. 11, 2025

Trial Date: None Set

1 I, Lilach H. Klein, hereby declare the following pursuant to 28 U.S.C. § 1746:

2 1. I am a member in good standing of the State Bar of California and the
3 Central, Northern, Southern, and Eastern Districts of California, and I, along with
4 my colleagues, represent Plaintiff Tinamarie Barrales (“Plaintiff”) in the above-
5 captioned action. I submit this Declaration in Support of the Stipulation and Request
6 for Remote Appearance on Defendant’s Motion to Dismiss Complaint. I make this
7 Declaration based on my personal knowledge and if called to testify, I could and
8 would competently testify to the matter contained herein.

9 2. On May 6, 2025, the Parties, through counsel, met and conferred
10 regarding the upcoming hearing on Defendant’s motion to dismiss, including,
11 subject to the Court’s approval, permitting a remote appearance for Plaintiff’s
12 counsel.

13 3. I am in my third trimester of pregnancy and will be 37 weeks pregnant
14 on May 15, 2025. Given this medical condition and the risk of premature labor, I
15 would like to avoid airplane travel and travel outside of Sacramento County where I
16 reside. Based on these facts, I believe good cause exists to permit a remote
17 appearance at the hearing on Defendant’s motion to dismiss.

18
19 Dated: May 7, 2025

CROSNER LEGAL, P.C.

20
21 By: /s/ Lilach H. Klein

22 Lilach H. Klein

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